

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:17-cv-00454-GKF-JFJ
	)	
1) CASTLE HILL STUDIOS LLC	)	
(d/b/a CASTLE HILL GAMING);	)	
2) CASTLE HILL HOLDING LLC	)	
(d/b/a CASTLE HILL GAMING); and	)	
3) IRONWORKS DEVELOPMENT, LLC	)	
(d/b/a CASTLE HILL GAMING)	)	
	)	
Defendants.	)	

**DECLARATION OF ROBERT SCHRAMER**

Pursuant to 28 U.S.C. § 1746, I, Robert Schramer, hereby declare as follows:

1. I am Chief Financial Officer at Video Gaming Technologies, Inc. (“VGT”). In this position, I am responsible for, among other things, tracking VGT’s financial performance and preparing forecasts. I make this declaration in support of VGT’s opposition to Defendants’ Motion Challenging Plaintiff’s Designations under the Protective Order. Except where otherwise indicated, this declaration is based on my personal knowledge, and, if called to testify, I could and would testify competently thereto.

2. I am familiar with the data that VGT maintains regarding the number of games it has in casinos. I have reviewed Exhibit 7 to Richard Williamson’s October 2, 2018 deposition. I understand that this exhibit contains, *inter alia*, the average number of VGT three-reel mechanical games in the United States in each calendar year from 2007 through 2017.

3. The number of VGT three-reel mechanical games is confidential information that VGT uses to track the company's performance over time, make forecasts, and develop business plans. If a competitor had access to this data, it would give the competitor unique insight into VGT's business, including its financial performance, and would allow the competitor to develop or refine strategies for competing with VGT. This would be harmful to VGT's competitive interests.

4. VGT has three-reel mechanical games in over 100 casinos.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 6 day of February 2019, in Franklin, Tennessee.

  
Robert Schramer